

Exhibit V

VOL. I
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EXHIBITS 1-20

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

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STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL

LONGSHOREMEN'S ASSOCIATION,

AFL-CIO, ET. AL,

DEFENDANTS.

* * * * *

DEPOSITION OF STEPHEN KEEFE, taken on
behalf of the Defendants, pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Bernadette J. D'Alelio,
Notary Public and Court Reporter within and for
the Commonwealth of Massachusetts, at the
Offices of Mullen & McGourty, 52 Temple Place,
Boston, Massachusetts, on May 8, 2006,
at 10:01 a.m., as follows:

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1 A. You would have to talk to my brother.
2 I have nothing to do with that.

3 Q. Prior to your suspension, do you
4 contend that you weren't given written notice
5 about the specific charges that you were being
6 summoned to by the rules committee?

7 A. I never received anything from Joe
8 Picard at my post-office box.

9 Q. Even that letter you signed for, which
10 is marked --

11 A. This one, I received. This other
12 stuff -- I've never received anything from Joe
13 Picard. I received stuff from McGaff.

14 Q. About what?

15 A. I don't know what -- I don't know what
16 it was for.

17 Q. When you went to the rules committee
18 on March 5, to that meeting, why did you go?

19 A. I was told to go.

20 Q. By who?

21 A. By the rules committee.

22 Q. In what manner were you told, verbally
23 or in writing?

24 A. In writing.

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1 Q. So that would be Exhibit 18; is that
2 right?

3 A. Yes.

4 Q. What does Exhibit 18 say? Can you
5 read that into the record, please?

6 A. The whole thing?

7 Q. Yeah.

8 A. "The Allied rules committee, who are
9 empowered by Rule Number 37 of the hiring hall
10 rules, are hereby notifying you to appear
11 before them. The committee summons you on this
12 date of March 5, 2003, at 12 noon to appear at
13 the hiring hall. The purpose of this hearing
14 is for you to show just cause as to why you
15 should not be suspended and placed into Gang
16 12. Please bring with you any resignation, any
17 retirement papers, tax returns or any other
18 documents that you deem pertinent. We have
19 found you to be in violation of not honoring
20 the pledge that you signed. Failure to appear
21 at this hearing could also result in a
22 sanction."

23 Q. And you got that letter?

24 A. I think I got that one, yeah.

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1 Q. That is what the certified-mail card
2 is?

3 A. It coincides with that, yes.

4 Q. In reading Exhibit 18, do you
5 understand what is being stated in that letter?

6 A. Yeah.

7 Q. Did you understand it when you read
8 it?

9 A. Yes.

10 Q. And you got that on February 18th; is
11 that right?

12 A. Yup.

13 Q. That is about two weeks prior to the
14 meeting?

15 A. Yes.

16 Q. Do you contend that two weeks' notice
17 is an unreasonable amount of time for you to be
18 summoned to a meeting?

19 A. No.

20 Q. When you got into the hearing or the
21 meeting, you waited outside and then you were
22 summoned in; is that right?

23 A. Yes.

24 Q. Given what you've read from Exhibit

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1 18, do you recall any discussion as to what the
2 point of view -- being called to the meeting?

3 A. I don't remember anything about what
4 they were saying at the meeting.

5 Q. Did you go with an attorney to the --

6 A. No.

7 Q. At the time, Mr. Lathrop was
8 representing you, though, wasn't he?

9 A. Yeah, I think so, right. Yeah.

10 Q. Did you inform the rules committee on
11 March 5, 2005, that you were working for John
12 T. Clark as a consultant?

13 A. I don't know if I said that.

14 Q. Did you inform the rules committee, or
15 did you state to the rules committee that they
16 knew of your employment at John T. Clark, yet
17 allowed you to move up from 12 to 11?

18 A. I don't remember.

19 Q. If you admitted that you were employed
20 by Clark at that rules committee meeting, do
21 you have any memory of saying you were going to
22 resign your position because you wanted to stay
23 in Gang 10?

24 A. I don't remember.